

REMARKS

Applicants respectfully request reconsideration of the present application based on the foregoing amendments and the following remarks. By this amendment, independent claims 1, 9 and 16 have been amended merely to incorporate subject matter from herewith-cancelled claims 2, 10 and 17 respectively, independent claim 13 has been amended for consistency between the independent claims and dependent claims 3, 7-8 and 19 are amended to maintain consistency with the claims from which they respectively depend. Claim 18 is cancelled. Accordingly, no new issues are raised and/or issues have been reduced for Appeal, and so entry of this amendment is respectfully requested. Upon entry of the amendment, claims 1, 3-9, 11-16 and 19-21 are pending in the application.

The Final Office Action objected to the "button number message" in claim 7 relying on the label "EC_DVDButton_Change_Message" shown at step 120 of Figure 3. Applicants restate the arguments related to the objection as provided in the response filed on March 29, 2005 and incorporate those arguments herein by reference. Specifically, Applicants stated previously that "[i]t is apparent from the text that the EC_DVDButton_Change_Message is one example of a message sent in response to activation of one of the display buttons..." Applicants referred the Examiner to the Specification at page 4, lines 9-19 which includes the following:

When this occurs, the media player 80 generates a Windows event message such as EC_DVD_Button_Change signifying that a particular button has been selected or actuated and providing its number (Step 120).

(Specification, Page 4, lines 15-17, emphasis added). Thus, the Specification provides EC_DVD_Button_Change as one example of a Windows event message that signifies selection of or actuation of a button, the button identified by a number. Figure 3 merely illustrates this one example in which an EC_DVDButton_Change message is sent. Further, the Specification explicitly teaches that a particular button's number is indicated in a Windows event message. Therefore, Applicants respectfully submit that claim 7 as drafted is consistent with the drawings and the Specification. Applicants respectfully submit that it is apparent that the claim recitation of "a button number message" is appropriate, consistent with, and fully supported by, the Specification and Applicants request withdrawal of the objection.

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In the Final Office Action, claims 1-4, 6-11 and 13-21 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,580,870 to Kanazawa et al. ("Kanazawa"). Applicants restate the arguments opposing the rejections that were provided in earlier communications including the response filed on March 29, 2005 and incorporate those arguments herein by reference. Nevertheless, Applicants have amended the claims to include certain limitations of dependent claims in the independent claims. No new issues arise from the amendments. Applicants respectfully submit that these amendments reduce the issues for appeal by further distinguishing the claims from the prior art.

The present invention provides a highly flexible system that adapts to provide URL information based on various contexts. Kanazawa does not teach a system, method or apparatus that utilizes a DVD authored by an authoring system that provides embedded commands for writing indicia of current position of play as required by the independent claims of the present application. Nor does Kanazawa disclose, anticipate, or suggest the use of a DVD Text Data parser as required by the claims of the present application.

Applicants have amended claims 1, 9, and 16 to replace the previously recited "URL deriving means" with "DVD Text Data parser" as previously recited in the herewith-cancelled claims 2, 10 and 17, respectively. For consistency, claim 13 has been similarly amended. Further, dependent Claims 3 and 6 have been amended to replace the generic term "control data" with DVD Text Data Structure. Applicants respectfully submit that the explicit requirement for a DVD Text Data parser even more clearly distinguishes the claimed invention from the prior art. In the "Guidebook for DVD-Video Text Data Usage," published by the DVD Forum (hereinafter referred to as "The DVD Forum Publication"), DVD Text Data is described (see for example, DVD Forum Publication at Chapter 3, pages 7-10). As evidenced by the DVD Forum Publication, DVD Text Data is known to those skilled in the DVD authoring art.

It is readily apparent that DVD Text Data is not taught by Kanazawa. Nevertheless, the Final Office Action relied on an inferences and unreasonably stretched interpretations of the teachings of Kanazawa in rejecting claims 2, 10 and 17 (now incorporated into claims 1, 9, 16 and 13). Specifically, the Final Office Action founded rejections of claims 2, 10 and 17 on the propositions that (1) a URL is a text-based address, (2) Kanazawa's URLs are received from a DVD and can allegedly be construed as DVD Text Data and (3) a combination of Kanazawa's

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Navigation manager and presentation engine is equivalent to – or somehow suggests – a DVD Text Data parser (See Final office Action at page 4, first full paragraph). None of these propositions withstands close inspection considering that:

- while a URL may indeed be a textual representation of a Web address, no reasonable grounds exist for equating a URL with DVD Text Data residing in a DVD's content data structure; for example, unlike Kanazawa's URLs, DVD Text Data can be characterized by content type and by location within a DVD logical structure or data stream (see DVD Forum Publication at page 4, section 2.1)
- while Kanazawa may obtain URL's from a DVD, Kanazawa does not explicitly teach DVD Text Data, a DVD Text Data Structure or the storing of URLs in the DVD Text Data, but merely teaches that URLs can be embedded in VTSI data as discussed in Applicants response to the Office Action mailed 2/5/2004
- Kanazawa's Navigation manager is taught as having the function of interpreting navigation data (Kanazawa, col. 11, lines 16-29), where URLs are regarded as commands; thus, any inference of parsing can only reasonably be drawn to the parsing of commands for discerning the substance of the command. One of ordinary skill in the art would not link a URL parser to a DVD Text Data parser because, for example, URLs are not data structures having characteristics and elements that are defined and managed by an industry standards body
- Kanazawa's presentation engine merely "effects title playback of moving pictures according to the instruction given by the navigation manager" and is therefore better described as a media player, not a DVD Text Data parser as recited in the claims (see col. 11, lines 40-42).

In contrast to Kanazawa, the claims of the present application require a DVD Text Data parser for *inter alia* parsing a DVD Text Data Structure to derive URLs. Kanazawa does not explicitly teach the parser or the DVD Text Data. Even if the Navigation Manager of Kanazawa could be inferred to include text parsing and the presentation manager could be construed as a video data parser, there is no reasonable basis for further stretching an interpretation of these inferred meanings to conclude that Kanazawa "clearly anticipates ... A Text Information Parser," as asserted by the Office action. Kanazawa does teach explicitly or through inference and construction, *DVD Text Data* or a *parser* capable of parsing "DVD Text Data" and the rejection

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of the claims is viable only if the existence or meaning of DVD Text Data is denied. The DVD Forum Publication confirms and defines the existence and meaning of DVD Text Data in the art and, consequently, Kanazawa cannot reasonably be considered to anticipate each and every element of the presently claimed subject matter. Therefore, Applicants respectfully request withdrawal of the rejections of amended claims 1, 9, 13 and 16 and their respective dependent claims.

Claims 5 and 12 and 46-51 stand rejected as being obvious over Kanazawa in view of U.S. Patent No. 6,580,870 to Wang et al. ("Wang"). These claims depend ultimately from amended independent claims 1 and 9 and thus are patentable for at least the reasons presented above. The deficiencies noted above are not cured by the alleged combination with Wang. Accordingly, the rejections of these claims should be withdrawn.

All objections and rejections having been addressed, and in view of the foregoing arguments, the claims are believed to be in form for allowance, and such action is earnestly solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, he is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP


ANTHONY G. SMYTH, Reg. No. 55,636
For David A. Jakopin, Reg. No. 32,995

2475 Hanover Street
Palo Alto, CA 94304-1114
(650) 233-4500

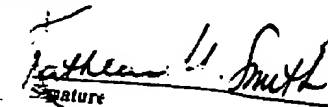
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CERTIFICATION UNDER 37 C.F.R. §§ 1.8 and/or 1.10*

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